GENNARO AURICCHIO S.P.A., recognizing the role it plays within the context of its economic, social, and environmental relationships, is committed to Social and Environmental Responsibility, grounding this commitment in the relentless pursuit of improving people's working conditions, respecting their dignity and freedom, and protecting the environment.
Management is firmly convinced that its commitment to Social and Environmental Responsibility can influence its contractual relationships, thereby ensuring the progressive dissemination of ethical and social principles and values to an ever-wider range of stakeholders.
In this regard, **GENNARO AURICCHIO S.P.A.**:

- considers its employees to be its greatest asset: it safeguards their rights, supports their professional and personal development, and ensures their health and safety in the workplace;
- considers its suppliers to be essential both for ensuring the quality of its products and services and for achieving social equity objectives;
- fosters dialogue with labor unions while respecting the rights and wishes of its employees;
- considers environmental protection to be a fundamental element of its growth and development strategy.

GENNARO AURICCHIO S.P.A. formally commits to:

- comply with national laws, other applicable laws, and requirements to which it has subscribed, including the provisions, international recommendations, and their interpretations officially issued by the relevant bodies on human rights (ILO – UN);
- always observe and comply with current and applicable legislation regarding the environment and occupational health and safety;
- adapt this document to regulatory changes and to the needs arising from the requirements defined in its ethical and environmental system or to other ethical, social, and environmental needs.

To achieve its objectives, **GENNARO AURICCHIO S.P.A.** expresses its willingness to involve and share its efforts for widespread Social and Environmental Responsibility throughout the entire supply chain of products or services in accordance with the following requirements:

CHILD LABOR

In compliance with national and international laws supporting the protection and safeguarding of children's psychological and physical development, **GENNARO AURICCHIO S.P.A.** does not employ minors nor does it support the use of child labor. Should the presence of a minor be discovered by mistake, **GENNARO AURICCHIO S.P.A.** will take appropriate measures to support and rehabilitate the minor involved.

FORCED AND COMPULSORY LABOR

GENNARO AURICCHIO S.P.A. does not engage in or support any form of forced or compulsory labor, in accordance with ILO Convention No. 29. Employees are free to perform their work under the terms and conditions agreed upon in accordance with the applicable National Collective Bargaining Agreement (CCNL). In compliance with privacy laws, employees are not required to surrender their personal documents at the start of the employment relationship, nor are they subject to any other forms of deposit or withholding of part of their wages (allowances, bonuses, etc.) for the purpose of coercing work performance.

OCCUPATIONAL HEALTH AND SAFETY

In accordance with national laws, **GENNARO AURICCHIO S.P.A.** guarantees a safe and healthy work environment.
With particular reference to its Risk Assessment Document and internal procedures aimed at preventing potential workplace accidents, **GENNARO AURICCHIO S.P.A.** has implemented all appropriate measures to mitigate the causes of potential risks.
The Management Representative for Health and Safety oversees the application of safety procedures during the performance of work activities.
Health and safety training programs are provided for new hires, in response to potential hazards identified during work activities, and in all cases required by applicable law.

ENVIRONMENTAL PROTECTION

GENNARO AURICCHIO S.P.A. aims to reduce the environmental impacts resulting from its operations.
For this reason, in addition to ensuring full compliance with applicable environmental regulations, **GENNARO AURICCHIO S.P.A.** monitors its energy and water consumption, as well as its use of chemicals and waste production, and takes active steps to reduce them.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

GENNARO AURICCHIO S.P.A. guarantees workers' right to form, join, and organize labor unions without any form of retaliation or discrimination against union representatives.
Furthermore, **GENNARO AURICCHIO S.P.A.** provides the means and spaces for communication with employees in order to ensure and promote collective bargaining.

GENNARO AURICCHIO S.P.A.
Cremona (CR), Gazzo (CR),
Cava Manara (PV), Somma Vesuviana (NA),
Scandiano (RE), Macomer (NU).

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DISCRIMINATION

GENNARO AURICCHIO S.P.A. in accordance with the ethical principles to which it adheres, does not support any form of discrimination based on race, gender, social class, national origin, caste, birth, religion, disability, gender identity, sexual orientation, family responsibilities, marital status, union membership, political opinions, age, or any other form of discrimination.
For all such circumstances that require special accommodations or the implementation of specific practices or principles, **GENNARO AURICCHIO S.P.A.** ensures that its employees are free to exercise these rights.
These guarantees are upheld throughout the entire employment relationship, from recruitment and hiring to access to training, promotions, termination, and retirement.
GENNARO AURICCHIO S.P.A. provides and enforces rules of conduct that ensure behavior and language that respect the individual dignity of every person..

HARASSMENT

In order to foster a climate of respect and professionalism in the workplace, **GENNARO AURICCHIO S.P.A.** also prohibits conduct that, while not constituting a violation of the law or regulations, is inappropriate in the workplace.
By way of example, but not limited to, verbal, visual, or physical conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment, or that unreasonably interferes with an individual's work performance and/or otherwise negatively affects a person's employment opportunities, such as:

- derogatory remarks, disparaging comments, obscene jokes, insults, vulgar language, epithets, and harsh sarcastic remarks;esposizione di manifesti, simboli, vignette, disegni, immagini del computer o messaggi di posta elettronica offensivi;
- displaying offensive posters, symbols, cartoons, drawings, computer images, or email messages;
- threats or physical intimidation directed at another person;
- sexual harassment.

DISCIPLINARY PROCEDURES

In accordance with company policy and in full compliance with applicable regulations, **GENNARO AURICCHIO S.P.A.** ensures compliance with behavioral rules aimed at protecting the dignity of all employees by prohibiting: any form of physical or mental coercion, corporal punishment, and harsh or inhumane treatment, including verbal abuse.

WORKING HOURS AND COMPENSATION

GENNARO AURICCHIO S.P.A. supports the fair compensation of its workforce in accordance with the laws governing collective bargaining, such as national labor contracts, second-level company-level agreements, and union agreements.
From working hours to pay scales, vacation and rest break regulations, as well as overtime, the company ensures a comprehensive application of the principles enshrined in current legislation - that is, a more protective approach to workers' rights.

PREGNANT FEMALE EMPLOYEES

GENNARO AURICCHIO S.P.A. ensures full compliance with the provisions of Legislative Decree 81/2008 for pregnant female employees. The employer, in collaboration with the occupational physician and the Health and Safety Manager (RSPP), and after consulting the Workers' Safety Representative (RLS), assesses whether any tasks or work processes are prohibited during pregnancy and/or breastfeeding and ensures that the employee is exempted from such tasks.
GENNARO AURICCHIO S.P.A. does not perform or require pregnancy tests when they are not mandated by current legislation..

REPORTS AND COMPLAINTS

Any employee who becomes aware of a situation that, in their opinion, may constitute a violation of a law, regulation, internal policy, or requirements received from our clients, or of this Policy, must report the violation or suspected situation to the Internal Sustainability Officer or may use the designated "suggestion box" to submit an anonymous report.
If an employee files a complaint in good faith regarding conduct that they reasonably believe to be unethical or to constitute a violation of the law, internal provisions, provisions received from our clients, this Policy, or other company policies, management will always ensure that no retaliation occurs.

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The commitment undertaken through this Policy also translates into actions aimed at raising awareness among all stakeholders regarding ethical, social, and environmental issues by making this Policy public and accessible at all levels of the company and to anyone who requests it.
The Management of **GENNARO AURICCHIO S.P.A.** makes all necessary human and financial resources available to ensure the maintenance and achievement of the highest standards of performance in ESG responsibility in accordance with this Policy.

Cremona, October 10, 2024

Management

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